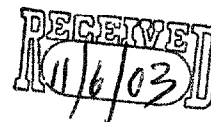




October 21, 2003

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Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Cola Nut Extract: In one clinical study, the ingestion of caffeine prior to exercise increased physical performance during prolonged endurance exercise and short-term intense exercise.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/21/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

Acceleration 11p

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LET

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825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM



October 21, 2003

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Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Many components of green tea have been found to have numerous biological activities that are supportive of human health.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: 

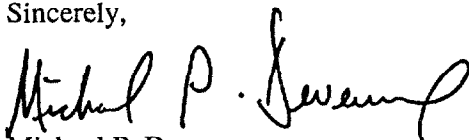
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/21/03

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Sincerely,



Michael P. Devereux
Chief Financial Officer



October 21, 2003

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Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	One component of green tea that has demonstrated health benefits is caffeine.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/21/03

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Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer



October 22, 2003

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Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Like cola nut, the caffeine in green tea has ergogenic effects and is effective in boosting energy levels and physical performance.* In addition to its ergogenic benefits, clinical studies have shown that green tea works synergistically with caffeine to boost thermogenesis (calorie burning).*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

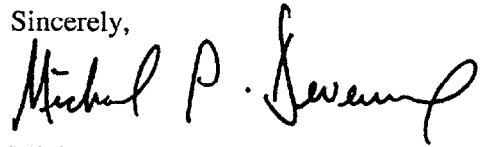
Date: _____

10/22/03

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Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Devereux
Chief Financial Officer



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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	In a recent study, the effects of green tea extract were evaluated in moderately obese patients. After 3 months, body weight of the patients was decreased by 4.6% and waist circumference by 4.48%. These results suggest the green tea extract to be a natural weight loss product, which exerts its activity by several ways, including inhibition of lipases and stimulation of thermogenesis.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

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Chief Financial Officer